

## *Office of the Chapter 13 Standing Trustee*

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January 10, 2018

The Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, NJ 08102

**RE: CHAPTER 13 BANKRUPTCY**  
**CASE NO. 17-17906 (JNP)**  
**DEBTOR: MAUREEN M. FALLS**

Dear Judge Poslusny:

Please accept this letter in lieu of a more formal objection to Debtor's Motion to Authorize Private Sale of Real Property, which is scheduled to be heard on shortened time, Tuesday January 16, 2018 at 10:00 a.m.

Debtor proposes to sell property located at 9 Vassar Avenue, Stratford, NJ, in the amount of \$140,000. The real property is one asset in the estate of the Debtor's late father of which she is one of three beneficiaries. Debtor's proposed net proceeds total approximately \$42,000, of which Debtor intends to claim \$13,100.00 as exempt under 11 U.S.C §522(d)(5). Pursuant to Schedule C, Debtor did not claim an exemption on this property. Instead, Debtor exhausted her (d)(5) exemption on property listed as 351 Chapel Heights Road, Sewell, NJ 08080.

Additionally, pursuant to the listing agreement, Debtor is using a real estate broker. It is requested that Debtor have the realtor appointed by the Court.

While the Trustee does not object to the sale of the property, it is respectfully requested Debtor be required to submit an amended proposed form of Order to the Judge's Chambers under the Seven Day Rule to include the following:

1. The balance of non-exempt proceeds shall be paid to the Chapter 13 Standing Trustee.
2. Title shall be conveyed by both Debtor and Trustee.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully Submitted,

**OFFICE OF THE CHAPTER 13  
STANDING TRUSTEE**

/s/ Jennifer R. Gorchow  
Jennifer R. Gorchow,  
Staff Attorney

JRG/jmc

cc: Jenkins & Clayman – *Via CM / ECF*  
Maureen Falls– *Via First Class Mail*